



# American Bakers Association

*Serving the Baking Industry Since 1897*

January 10, 2000

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, Maryland 20852

Re: Docket No. 94P-0036; Food Labeling: Trans Fatty Acids in  
Nutrition Labeling, Nutrient Content Claims, and Health Claims;  
99 Fed. Reg. 62745 (November 17, 1999)

Dear Ms. Thompson:

These comments are submitted on behalf of the members of the American Bakers Association (ABA), the national trade association representing the wholesale baking industry. ABA membership consists of approximately 300 bakers and bakery suppliers who together are responsible for the manufacture of approximately 80 percent of the baked goods sold in the United States. ABA is requesting an extension of the comment period for an additional 90 days beyond the current comment closing date of February 15.

The ABA strongly believes that more time is needed to thoroughly study and formulate a response for our industry on the issue of trans fatty acid labeling. This is a multi-faceted and very complex issue that has the potential to deeply impact the wholesale baking industry and its products. Our members need to determine how they want to comment and to what extent their product labeling would be impacted.

FDA issued this very important proposal over a holiday period, which has added to the crunch of the current time constraints. Our membership has not yet had a chance to meet and to begin discussing this issue. It would be unfair to the industry, as well as FDA, and ultimately to the consumer, if industry is not given sufficient time to accurately formulate a thorough response.

94P-0036

EXT 6

American Bakers Association  
Docket No. 94P-0036  
January 10, 2000  
Page 2

It should also be noted that FDA raised the question of the possibility of future reformulation for the baking industry. A question of this multitude could not possibly be answered in the current short comment period; additional time is needed to weigh this complex issue on the industry's wide variety of products.

ABA appreciates this opportunity to request an extension of the comment period for an additional 90 days. The technical contact for these comments is Lee Sanders, ABA Vice President, Regulatory and Technical Services, American Bakers Association, 1350 I Street, N.W., Suite 1290 Washington, D.C. 20005-3305 (telephone) 202-789-0300, (fax) 202-898-1164.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul C. Abenante", with a long horizontal flourish extending to the right.

Paul C. Abenante  
President & CEO  
American Bakers Association